

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA**

CIVIL ACTION FILE NO. 3:24-CV-00602

Life Butter, LLC

Plaintiff,

v.

BPI Equipment, Inc.

Defendant,

**Plaintiff's Consent Motion for Extension of
Time to Respond to Motion to Dismiss**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Rule 7.1, Plaintiff Life Butter, ("Life Butter"), with the consent of Defendant BPI Equipment, Inc. ("BPI Equipment"), moves the Court for a twenty-one-day extension of time, through and including August 29, 2024, to answer or otherwise respond to BPI Equipment's Motion to Dismiss.

1. BPI Equipment filed a Motion to Dismiss in this action on July 26, 2024.
2. The current deadline for Life Butter to respond is August 9, 2024.
3. Accordingly, this Motion is being made before the original time for Life Butter to otherwise respond.
4. Counsel for Life Butter needs additional time to prepare a thorough response to Defendants' Motion.
5. Additionally, the Parties are engaging in good faith negotiations and seek to resolve this matter and will use the additional time to work toward settlement.
6. This Motion is made in good faith and is not intended for purposes of delay.
7. Pursuant to Local Rule 7.1(b) and this Court's Standing Order, counsel for Life Butter has consulted with counsel for BPI Equipment, consents to this requested extension.

8. A proposed Order granting the requested extension will be submitted with this Motion.

WHEREFORE, Plaintiff Life Butter respectfully requests the Court enter an Order extending the time for Life Butter to file a response or otherwise respond to the Motion to Dismiss in this matter through and including August 30, 2024.

This the 30th day of July, 2024.

HULL & CHANDLER, P.A.

By: /s/ Elizabeth Venum
Elizabeth Venum
NC Bar No. 49747
Kyle Putnam
NC Bar No. 56382
1009 East Boulevard
Charlotte, NC 28203
Phone: (704) 375-8488
lvennum@lawyercarolina.com
kputnam@lawyercarolina.com
Counsel for Plaintiff

Certificate of Service

I hereby certify that on this day, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of this filing and an electronic copy of same to all counsel of record registered with the CM/ECF system.

This the 30th of July, 2024.

HULL & CHANDLER, P.A.

By: /s/ Elizabeth Vennum
Elizabeth Vennum